

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-12480 (JTD)

(Jointly Administered)

**RE: Docket Nos. 875, 933, 1221**

**Obj. Deadline: Feb. 6, 2025 at 4:00 p.m.**

**Hearing Date: May 20, 2025 at 10:00 a.m.**

**WITHDRAWAL OF LIMITED OBJECTION TO DEBTORS' TWELFTH OMNIBUS  
MOTION FOR ENTRY OF AN ORDER, PURSUANT TO SECTIONS 105(a), 365(a),  
AND 554 OF THE BANKRUPTCY CODE AUTHORIZING THE DEBTORS  
TO (I) REJECT CERTAIN UNEXPIRED LEASES AND A CERTAIN  
UNEXPIRED SUBLEASE, EFFECTIVE AS OF THE REJECTION  
DATE; AND (II) ABANDON PERSONAL PROPERTY**

The ChildSmiles Group, LLC, a/k/a Abra Health, LLC ("Abra Health"), by and through its undersigned counsel, hereby withdraws its limited objection (Docket No. 933) with respect to the *Debtors' Twelfth Omnibus Motion for Entry of an Order, Pursuant to Sections 105(a), 365(a), and*

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of their U.S. federal tax identification numbers, to the extent applicable, are Franchise Group, Inc. (1876), Freedom VCM Holdings, LLC (1225), Freedom VCM Interco Holdings, Inc. (2436), Freedom Receivables II, LLC (4066), Freedom VCM Receivables, Inc. (0028), Freedom VCM Interco, Inc. (3661), Freedom VCM, Inc. (3091), Franchise Group New Holdco, LLC (0444), American Freight FFO, LLC (5743), Franchise Group Acquisition TM, LLC (3068), Franchise Group Intermediate Holdco, LLC (1587), Franchise Group Intermediate L, LLC (9486), Franchise Group Newco Intermediate AF, LLC (8288), American Freight Group, LLC (2066), American Freight Holdings, LLC (8271), American Freight, LLC (5940), American Freight Management Company, LLC (1215), Franchise Group Intermediate S, LLC (5408), Franchise Group Newco S, LLC (1814), American Freight Franchising, LLC (1353), Home & Appliance Outlet, LLC (n/a), American Freight Outlet Stores, LLC (9573), American Freight Franchisor, LLC (2123), Franchise Group Intermediate B, LLC (7836), Buddy's Newco, LLC (5404), Buddy's Franchising and Licensing, LLC (9968), Franchise Group Intermediate V, LLC (5958), Franchise Group Newco V, LLC (9746), Franchise Group Intermediate BHF, LLC (8260); Franchise Group Newco BHF, LLC (4123); Valor Acquisition, LLC (3490), Vitamin Shoppe Industries LLC (3785), Vitamin Shoppe Global, LLC (1168), Vitamin Shoppe Mariner, LLC (6298), Vitamin Shoppe Procurement Services, LLC (8021), Vitamin Shoppe Franchising, LLC (8271), Vitamin Shoppe Florida, LLC (6590), Betancourt Sports Nutrition, LLC (0470), Franchise Group Intermediate PSP, LLC (5965), Franchise Group Newco PSP, LLC (2323), PSP Midco, LLC (6507), Pet Supplies "Plus", LLC (5852), PSP Group, LLC (5944), PSP Service Newco, LLC (6414), WNW Franchising, LLC (9398), WNW Stores, LLC (n/a), PSP Stores, LLC (9049), PSP Franchising, LLC (4978), PSP Subco, LLC (6489), PSP Distribution, LLC (5242), Franchise Group Intermediate SL, LLC (2695), Franchise Group Newco SL, LLC (7697), and Educate, Inc. (5722). The Debtors' headquarters is located at 109 Innovation Court, Suite J, Delaware, Ohio 43015.

*554 of the Bankruptcy Code Authorizing the Debtors to (I) Reject Certain Unexpired Leases and a Certain Unexpired Sublease, Effective as of the Rejection Date; and (II) Abandon Personal Property* (Docket No. 875). This withdrawal is without prejudice to any rights, remedies, claims, or defenses that Abra Health may have in respect of the rejected Sublease Agreement for the second floor of the premises located at 300 Harmon Meadow Boulevard, Secaucus, New Jersey 07094, including, without limitation, any rights it may have under Sections 365(h), 502(g), 503(b), and/or 553 of the Bankruptcy Code or any other relevant provisions of the Bankruptcy Code, or any that may arise under the terms of the Sublease Agreement or that might otherwise be available at law or in equity, all of which are expressly reserved.

Dated: May 19, 2025  
Wilmington, Delaware

**BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP**

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*-and-*

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*Counsel to The ChildSmiles Group, LLC  
a/k/a Abra Health*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 19, 2025, I caused the foregoing document to be served by electronic means via the Court's CM/ECF system to all parties registered to receive electronic notice in this case.

/s/ Jennifer R. Hoover  
Jennifer R. Hoover (DE No. 5111)